

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,)	
)	
)	
Plaintiff,)	
)	Case No. 2:17-CV-01251
v.)	
)	Hon. Patricia L. Dodge
NORFOLK SOUTHERN CORPORATION)	
and NORFOLK SOUTHERN RAILWAY)	
COMPANY,)	
)	
Defendants.)	
)	

JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff U.S. Equal Employment Opportunity Commission (the “Commission” or “EEOC”) and Defendants Norfolk Southern Corporation and Norfolk Southern Railway Company (“Defendants”) respectfully move the Court for approval and entry of the attached Consent Decree (Exhibit 1). In support of the Motion, the parties state as follows:

1. The Commission and Defendants have negotiated the attached Consent Decree as a resolution of the Commission’s claims in the above-captioned case.
2. The Commission and Defendants believe that the terms of this Consent Decree are adequate, fair, reasonable, equitable and just.
3. The Commission and Defendants believe that the Consent Decree conforms with the Federal Rules of Civil Procedure and is not in derogation of the rights or privileges of any person. The entry of this Consent Decree will further the objectives of the Title VII of the Civil Rights Act of 1964, as amended, and will be in the best interests of the parties, those for whom the Commission seeks relief and the public.

Respectfully submitted,

/s/

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/s/

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2020, I filed a true and correct copy of the foregoing Joint Motion for Entry of Consent Decree with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Respectfully submitted,

For Plaintiff U.S. Equal Employment Opportunity Commission:

/s/ Gregory A. Murray
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